

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Feb 11, 2025

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

MANUEL ANTONIO RODRIGUEZ,

Defendant.

No. 4:25-CR-06003-SAB-1

PROTECTIVE ORDER

Before the Court is the parties' Stipulation for Protective Order Regarding Identification of Minor Victim Pursuant to 18 U.S.C. § 3509, ECF No. 21, and related Motion to Expedite, ECF No. 22. Defendant is represented by Dennis Alan Hanson. The Government is represented by Laurel Holland. The motions were considered without oral argument. Good cause exists to grant the motions.

Accordingly, **IT IS ORDERED:**

1. The parties' Motion to Expedite, ECF No. 22, is **GRANTED**.
2. The parties' Stipulation for Protective Order Regarding Identification of Minor Victim Pursuant to 18 U.S.C. § 3509, ECF No. 21, is **GRANTED**.
3. Good cause having been shown, the Court hereby enters this Protective Order governing discovery proceedings in this matter. Documents or information disclosed in discovery that a party or non-party reasonably and good faith believes to be confidential as set forth herein can be designated as confidential as set forth herein. **Nothing in this Order affects the applicable legal**

PROTECTIVE ORDER # 1

standards for the sealing of materials actually filed with the Court.

1. The privacy protection measures mandated by 18 U.S.C. § 3509(d), which apply when a case involves a person under the age of eighteen years who is alleged to be a victim of a crime of sexual exploitation, or a witness to a crime committed against another person, apply to this case.
2. All persons acting in this case in a capacity described in 18 U.S.C. § 3509(d)(1)(B), shall:
 - a. Keep all documents that disclose the names, identities, personal identifying information (“PII”) or any other information concerning minors in a secure place to which no person who does not have reason to know their contents has access;
 - b. Disclose such documents or the information in them that concerns minors only to persons who, by reason of their participation in the proceeding, have reason to know such information;
 - c. Not permit Defendant to review discovery outside the presence of defense counsel or a defense investigator;
 - d. Not permit Defendant to keep discovery in their own possession outside the presence of defense counsel or a defense investigator; and
 - e. Not permit Defendant to keep, copy, or record the identities of any minor or victim identified in discovery in this case.
3. All papers to be filed that disclose the names or any other information identifying or concerning minors shall be filed under seal without necessity of obtaining a court order, and that the person who makes the filing shall submit to the Clerk of the Court:
 - a. The complete paper to be kept under seal; and
 - b. The paper with the portions of it that disclose the names or other information identifying or concerning children redacted, to be

placed in the public record.

4. The parties and the witnesses shall not disclose minors' identities during any proceedings connected with this case. The parties and witnesses will refer to alleged minor victims only by using agreed-upon initials or pseudonyms (e.g., "Minor 1"), rather than their bona fide names, in motions practice, opening statements, during the presentation of evidence, in closing arguments, and during sentencing.
5. The United States may produce discovery to Defendant that discloses the bona fide identity, images, and PII of the alleged minor victim, in order to comply with the United States' discovery obligations. Defendant, the defense team, Defendant's attorney and investigator, and all of their externs, employees, and/or staff members, shall keep this information confidential as set forth above.
6. This Order shall apply to any attorneys who subsequently become counsel of record, without the need to renew or alter the Order.
7. This Order shall apply to the bona fide identity, images, and PII of any minors who are identified over the course of the case, whether or not such minors are known to the United States and/or Defendant at the time the Order is entered by the Court.

1 4. The confidentiality obligations imposed by this Order shall remain in
2 effect until the Court orders otherwise.

3 **IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter
4 this Order and to provide copies to counsel.

5 **DATED** this 11th day of February 2025.



10 *Stanley A. Bastian*

11 Stanley A. Bastian
12 Chief United States District Judge
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